

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

PAULSON PRV HOLDINGS LLC, et al.

Plaintiffs

V.S.

FAHAD GHAFAR, et al.

Defendants

CIVIL CASE NO.: 23-1521 (SCC)

CIVIL RICO; FRAUD; BREACH OF FIDUCIARY
DUTIES; UNJUST ENRICHMENT AND DAMAGES

**SPECIAL APPEARANCE TO REQUEST AN EXTENSION OF TIME TO
FILE MOTION TO DISMISS, WITHOUT SUBMITTING OR
CONSENTING TO THE COURT'S *IN PERSONAM* JURISDICTION**

TO THE HONORABLE COURT:

COME NOW codefendant Saira Ghaffar, **without submitting or consenting to this court's *in personam* jurisdiction**, through the undersigned counsel and very respectfully **SET FORTH** and **PRAY**:

The appearing counsel has been retained to represent Mrs. Saira Ghaffar in the above-reference matter and the instant motion is filed in order to activate the Court's CM/ECF system so that further filings are notified to the appearing counsel as attorney for said party. The instant appearance is made **without submitting nor consenting to this Honorable Court's *in personam* jurisdiction**, since there are strong grounds for dismissal of the instant action for failure to comply with multiple sections of Rule 4 of the Federal Rules of Civil Procedure. The undersigned will be filing a motion to dismiss on these ground.

The undersigned is coordinating with Mrs. Ghaffar to gather all the necessary information in support of dismissal of the instant complaint against her and therefore it is respectfully requested a thirty (30) day extension to file the appearing party's motion to dismiss.

WHEREFORE it is respectfully requested from this Honorable Court that the undersigned's appearance hereby **ALLOWED** and a thirty (30) day extension be **GRANTED** to file a motion to dismiss in the above-captioned matter.

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that the instant document has been filed with the Court's CM/ECF System, which will simultaneously serve notice on all counsels of record, to their registered e-mail addresses. Any non-registered attorneys and/or parties will be served via regular mail.

In San Juan, Puerto Rico this 13th day of September, 2024.

RESPECTFULLY SUBMITTED,

ERE CONSULTING LLC

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